

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

DR. PAM ADAMSON, WANDA	:	
SMITH, OPHELIA	:	
BURROUGHS, MARY BAKER,	:	
DR. ALIEKA ANDERSON and	:	
CHARLTON BIVINS, in their	:	CIVIL ACTION
official capacities as members of	:	
the Clayton County Board of	:	FILE NO. 1:12-cv-01665-CAP
Education and individually as	:	
residents and voters in the Clayton	:	
County School District,	:	
	:	
Plaintiffs,	:	
	:	
v.	:	
	:	
CLAYTON COUNTY	:	
ELECTIONS AND	:	
REGISTRATION BOARD,	:	
ROBERT P. BOLIA, PATRICIA	:	
PULLAR, RUTH F. ASH,	:	
VIVIAN BALDWIN AND JIM	:	
CONSTABLE, in their official	:	
capacities as members of the	:	
Clayton County Elections and	:	
Registration Board,	:	
	:	
Defendants.	:	

**PLAINTIFFS' MOTION FOR DECLARATORY JUDGMENT AND FINAL
INJUNCTIVE RELIEF**

**COME NOW, DR. PAM ADAMSON, WANDA SMITH, OPHELIA
BURROUGHS, MARY BAKER, DR. ALIEKA ANDERSON and CHARLTON**

BIVINS, in their official capacities as members of the Clayton County Board of Education and individually as residents and voters in the Clayton County School District, Plaintiffs in the above-styled action ("Plaintiffs"), and respectfully move the Court for a declaratory judgment that the current Clayton County Board of Education (hereinafter referred to as the "BOE") voting districts are unconstitutional and final injunctive relief, specifically to create and adopt a new voting district map for the BOE, showing the Court as follows:

1.

Plaintiffs show that for the reasons stated in their Complaint as well as in their Memorandum of Law In Support of this Motion, the current voting districts for the BOE are unconstitutional since they violate the "one person, one vote" principal.

2.

Consequently, Plaintiffs respectfully request that the Court enter a decree declaring that the current BOE voting districts are unconstitutional and final injunction prohibiting any further elections based on the current BOE voting districts.

3.

Plaintiffs further request that the Court draw a new map setting forth constitutional voting districts for the BOE.

4.

In order to assist the Court with the task of redrawing the BOE voting districts, Plaintiffs submit a proposed new BOE district voting map with a supporting analysis that meets the requirements of the Voting Rights Act of 1965.

5.

While Plaintiffs submit a proposed new map containing constitutional voting districts for the BOE, Plaintiffs do so only in an effort to assist the Court to draw its own map setting forth constitutional voting districts. Plaintiffs do not insist that its proposed map be the map eventually adopted by the Court.

Respectfully submitted this 8th day of June, 2012.

BROCK, CLAY, CALHOUN & ROGERS, LLC
Attorney for Plaintiffs

/s/ Todd E. Hatcher
Todd E. Hatcher, Esq.
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	:	
Defendants.	:	

CERTIFICATE OF COMPLIANCE WITH L.R. 5.1

Pursuant to Local Rule 5.1, the undersigned counsel hereby certifies that the foregoing pleading was prepared with one of the font and point selections approved by the Court.

This 8th day of June, 2012.

BROCK, CLAY, CALHOUN & ROGERS, LLC
Attorney for Plaintiffs

/s/ Todd E. Hatcher

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	:	
Defendants.	:	

CERTIFICATE OF SERVICE

The undersigned does hereby certify that a true and correct copy of

PLAINTIFFS' MOTION FOR DECLARATORY JUDGMENT AND FINAL

INJUNCTIVE RELIEF has been served upon counsel for the opposing party in the foregoing matter by U.S. Mail and by electronic mail, addressed as follows:

Jack Hancock, Esq.
jhancock@fmglaw.com
Freeman, Mathis & Gary
100 Galleria Parkway
Suite 1600
Atlanta, Georgia 30339

This 8th day of June, 2012.

BROCK, CLAY, CALHOUN & ROGERS, LLC
Attorney for Plaintiffs

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